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UNITED STATES DISTRICT COURT
DISTRICT OF MONTANA
MISSOULA DIVISION

TANYA GERSH,

Plaintiff,

vs.

ANDREW ANGLIN, publisher of
the *Daily Stormer*,

Defendant.

Case No.: 9:17-cv-00050-DLC-JCL

DECLARATION OF DAVID C.
DINIELLI IN SUPPORT OF
PLAINTIFF'S RESPONSE IN
OPPOSITION TO DEFENDANT'S
MOTION TO DISMISS

I, David C. Dinielli, declare:

1. I am a deputy legal director at the Southern Poverty Law Center and one of the counsel for Plaintiff Tanya Gersh in this action. I have knowledge of the facts herein.

2. Attached as **Exhibit A** is a true and correct copy of an article written by Andrew Anglin entitled “Local Fake News Gives Anglin the Hitler Treatment” that was published on the *Daily Stormer* on February 17, 2017. The article was accessed and captured at my direction on March 16, 2017.

3. Attached as **Exhibit B** are true and correct copies of two LexisNexis Accurint reports compiled on Andrew B. Anglin. The reports were requested by the Southern Poverty Law Center at my direction on December 23, 2016, and December 8, 2017.

4. Attached as **Exhibit C** is a true and correct copy of an article written by Andrew Anglin entitled “Regarding Andrew Anglin’s Height” that was published on the *Daily Stormer* on May 3, 2017. The article was accessed and captured at my direction on December 7, 2017.

5. Attached as **Exhibit D** is a true and correct copy of the registration information for Andrew B. Anglin available through the Franklin County Board of Elections website. The information was accessed and captured at my direction on December 20, 2017.

6. Attached as **Exhibit E** is a true and correct copy of a Cincinnati.com article by Jessie Balmert entitled “Daily Stormer neo-Nazi website owner once registered to vote at fake address,” published August 31, 2017. The article was last accessed and captured at my direction on December 20, 2017.

7. Attached as **Exhibit F** is a true and correct copy of the results of a property records search for Greg Anglin on the Franklin County, Ohio, Auditor's website, along with true and correct copies of the Auditor property records for parcels owned by Greg Anglin. The search results and records were last accessed and captured at my direction on December 20, 2017.

8. Attached as **Exhibit G** is a true and correct copy of the corporation details for Morning Star Ministries USA, Inc. on the Ohio Secretary of State website. According to the corporation details, Greg Anglin is the agent/registrant of Morning Star Ministries USA, Inc. and one of the corporation's incorporators. The corporation details were last accessed and captured at my direction on December 20, 2017.

9. Attached as **Exhibit H** is a true and correct copy of the corporation details for Moonbase Holdings, LLC on the Ohio Secretary of State website, along with a true and correct copy of the Articles of Organization filed for Moonbase Holdings, LLC. According to these documents, Andrew B Anglin is the agent/registrant of Moonbase Holdings, LLC and the sole listed incorporator. The corporation details and Articles of Organization were last accessed and captured at my direction on December 20, 2017.

10. Attached as **Exhibit I** is a true and correct copy of the corporation details for Daily Stormer, a trade name registered with the Ohio Secretary of State,

along with a true and correct copy of the Name Registration filed for Daily Stormer. According to these documents, Andrew Anglin is the agent and registrant for Daily Stormer. The corporation details and Name Registration were last accessed and captured at my direction from the Ohio Secretary of State website on December 20, 2017.

11. Attached as **Exhibit J** is a true and correct copy of the corporation details for Andrew Anglin, a trade name registered with the Ohio Secretary of State, along with a true and correct copy of the Name Registration filed for Andrew Anglin. According to these documents, Moonbase Holdings, LLC is the agent and registrant for Andrew Anglin. The corporation details and Name Registration were last accessed and captured from the Ohio Secretary of State website at my direction on December 20, 2017.

12. Attached as **Exhibit K** is a true and correct copy of the Whois Lookup report for Dailystormer.com, accessed and captured at my direction on December 23, 2016.

13. Attached as **Exhibit L** is a true and correct copy of an article written by Andrew Anglin entitled “What is Happening Here with All of This?” that was published on the *Daily Stormer* on April 27, 2015. The article was accessed and captured at my direction on February 3, 2017.

14. Attached as **Exhibit M** is a true and correct copy of the docket report for Franklin County Court of Common Pleas case number 17-MS-343, last accessed and captured at my direction on December 20, 2017.

15. Attached as **Exhibit N** is a true and correct copy of the electronic version of the *Daily Reporter* newspaper publication for September 13, 2017, last accessed and captured at my direction on December 20, 2017. The public notice regarding this case was published on page 14 of the *Daily Reporter* and is visible on page 15 of the PDF of this copy.

16. Attached as **Exhibit O** is a true and correct copy of the Proof of Publication dated November 9, 2017, which was docketed in the Franklin County Court of Common Pleas case number 17-MS-343 on November 9, 2017.

17. Attached as **Exhibit P** is a true and correct copy of an *LA Times* article by Matt Pearce entitled “What happens when a millennial goes fascist? He starts up a neo-Nazi site” published June 24, 2015. The article was last accessed and captured at my direction on December 20, 2017.

18. Attached as **Exhibit Q** is a true and correct copy of an article written by Andrew Anglin entitled “Fake News: CNN Uses Photoshopped Image of Andrew Anglin!” that was published on the *Daily Stormer* on July 12, 2017. The article was last accessed and captured at my direction on December 20, 2017.

19. Attached as **Exhibit R** is a true and correct copy of an article written by Andrew Anglin entitled “Nigerians Love Neo-Nazi White Supremacist Andrew Anglin” that was published on the *Daily Stormer* on July 14, 2017. The article was last accessed and captured at my direction on December 8, 2017.

20. Attached as **Exhibit S** is a true and correct copy of an article entitled “Where in the world is America’s leading neo-Nazi troll?” by Aaron Sankin and published by *Reveal* on July 27, 2017. The article was last accessed and captured at my direction on December 20, 2017.

21. Attached as **Exhibit T** is a true and correct copy of the Franklin County, Ohio, Court of Common Pleas Rule of Practice 91. It was accessed and captured from the Franklin County Court of Common Pleas website at my direction on December 20, 2017.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on this December 21, 2017.

/s/ David C. Dinielli

David C. Dinielli